

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CONSUMER FINANCIAL
PROTECTION BUREAU,

Plaintiff,

v.

FREEDOM MORTGAGE
CORPORATION,

Defendant.

CASE NO: 9:23-cv-81373-DMM

DEFENDANT FREEDOM MORTGAGE CORPORATION'S
REPLY TO PLAINTIFF'S RESPONSE STATEMENT OF
MATERIAL FACTS AND ADDITIONAL FACTS

Defendant, Freedom Mortgage Corporation (“Freedom”), by and through its undersigned counsel, pursuant to Southern District of Florida Local Rule 56.1, asserts the following in Reply to Plaintiff’s Statement of Material Facts in Support of Plaintiff’s Motion for Summary Judgment:

I.

REPLY TO PLAINTIFF’S STATEMENT OF ADDITIONAL MATERIAL FACTS

6. Undisputed.
7. Undisputed.
8. Undisputed.
9. Undisputed as to the truth of the material fact stated. However, Defendant disputes the implication that an illegal order may be enforced against it, even with its agreement.
10. Undisputed as to the truth of the material fact stated. However, Defendant disputes the implication that an illegal order may be enforced against it, even after waiving judicial review of the Consent Order.
11. Undisputed as to the truth of the material fact stated. However, Defendant disputes the implication that an illegal order may be enforced against it, even after waiving any challenge to the validity of the Consent Order.
12. Undisputed as to the truth of the material fact stated. However, Defendant disputes that this fact supports the conclusion Plaintiff seeks to draw from it in the Statement of Facts (through the heading under which it falls) or in Plaintiff’s Opposition Brief.
13. Undisputed as to the truth of the material fact stated. However, Defendant disputes that this fact supports the conclusion Plaintiff seeks to draw from it in the Statement of Facts (through the heading under which it falls) or in Plaintiff’s Opposition Brief.

14. Undisputed as to the truth of the material fact stated. However, Defendant disputes that this fact supports the conclusion Plaintiff seeks to draw from it in the Statement of Facts (through the heading under which it falls) or in Plaintiff's Opposition Brief.
15. Undisputed as to the truth of the material fact stated. However, Defendant disputes that this fact supports the conclusion Plaintiff seeks to draw from it in the Statement of Facts (through the heading under which it falls) or in Plaintiff's Opposition Brief.

Dated: June 7, 2024

Respectfully submitted,

/s/ Herman J. Russomanno III

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CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2024, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will provide automatic notice to the below listed counsel of record:

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